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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA, ) NO. 22-MJ-70952 MAG  
17 Plaintiff, )  
18 v. ) AMENDED STIPULATION TO EXCLUDE TIME  
19 KRISTINA LANSANG GLORIA, ) UNDER THE SPEEDY TRIAL ACT AND  
20 Defendant. ) WAIVER UNDER FRCP 5.1 FROM SEPTEMBER  
21 ) 6, 2022 TO NOVEMBER 1, 2022 AND  
22 ) ORDER  
23 )  
24 )  
25 )

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26 It is hereby stipulated by and between counsel for the United States and counsel for the  
27 defendant Kristina Lansang Gloria, that the currently scheduled appearance be continued to November  
28 1, 2022, and time be excluded under the Speedy Trial Act from September 6, 2022 through November 1,  
1, 2022. It is further stipulated that time be waived under Federal Rule of Criminal Procedure 5.1 from  
September 6, 2022 through November 1, 2022.

On July 20, 2022, the defendant made her initial appearance in magistrate court. The  
government moved for detention and the matter was continued to July 27, 2022.

On July 27, 2022, the Court released the defendant and the matter was continued to August 3,

1 2022 for status on arraignment/preliminary hearing.

2 The government provided defense counsel with a substantial amount of discovery and plea offer.

3 The parties now request a continuance considering the defense's review of the materials and for  
4 further plea negotiations.

5 For these reasons, the parties stipulate and agree that excluding time until November 1, 2022 will  
6 allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further  
7 stipulate and agree that the ends of justice served by excluding the time from September 6, 2022 through  
8 November 1, 2022 from computation under the Speedy Trial Act outweigh the best interests of the  
9 public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

10 The undersigned Assistant United States Attorney certifies that she has obtained approval from  
11 counsel for the defendant to file this stipulation and proposed order. The undersigned Assistant United  
12 States Attorney further certifies that she discussed the above with pretrial services.

13 IT IS SO STIPULATED.

14 DATED: September 30, 2022

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/s/  
ALEXIS JAMES  
Assistant United States Attorney

16 DATED: September 30, 2022

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/s/  
MARTHA BOERSCH  
Counsel for Defendant Kristina Lansang Gloria

20 **ORDER**

21 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the  
22 Court finds that failing to exclude the time under the Speedy Trial Act and waive time under FRCP 5.1  
23 from September 6, 2022 through November 1, 2022 would unreasonably deny defense counsel and the  
24 defendant the reasonable time necessary for effective preparation, taking into account the exercise of  
25 due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by  
26 excluding the time from September 6, 2022 to November 1, 2022 from computation under the Speedy  
27 Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and

1 with the consent of the parties, IT IS HEREBY ORDERED that the time from September 6, 2022  
2 through November 1, 2022 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §  
3 3161(h)(7)(A), (B)(iv).

4 With the consent of the defendant, and taking into account the public interest in the prompt  
5 disposition of criminal cases, the court sets the preliminary hearing to November 1, 2022 and — based  
6 on the parties' showing of good cause — finds good cause for extending the time limits for a  
7 preliminary hearing under Federal Rule of Criminal Procedure 5.1 and for extending the 30-day time  
8 period for an indictment under the Speedy Trial Act (based on the exclusions set forth above). *See* Fed.  
9 R. Crim. P. 5.1; 18 U.S.C. § 3161(b).

10 IT IS SO ORDERED.

11 DATED: September 30, 2022

